

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

FAMILY DOLLAR, INC.,

Plaintiff,

v.

**AMERICAN ARBITRATION
ASSOCIATION, INC.,**

Defendant.

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Case No. _____

COMPLAINT

EXHIBIT C

From: AAA Heather Santo <heathersanto@adr.org>
Sent: Monday, December 2, 2019 1:17 PM
To: [REDACTED] Beth Berman
Cc: AAA Patrick Tatum; [REDACTED]; [REDACTED]
Subject: RE: [REDACTED] arbitrations
Attachments: Exhibit B.xlsx

Dear Counsel,

This will acknowledge receipt of Claimants' email dated November 29, 2019.

Pursuant to the agreement of the parties, the AAA is reopening the matters involving the 1,166 individuals identified on the attached spreadsheet.

We will proceed with administration upon receipt of Respondent's payment in the amount of \$2,565,200.00. Please mail your check to the American Arbitration Association at 13727 Noel Road, Suite 700, Dallas, TX 75240.

Please do not hesitate to contact me should you have any questions.

Sincerely,

Heather Santo



Heather Santo

American Arbitration Association

1301 Atwood Ave, Suite 211N, Johnston, RI 02919
T: 401 431 4703 F: 401 435 6529 E: heathersanto@adr.org
adr.org | icdr.org | aaamediation.org



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From: [REDACTED]
Sent: Friday, November 29, 2019 4:51 PM
To: AAA Heather Santo <heathersanto@adr.org>; Beth Berman <bberman@dollartree.com>
Cc: AAA Patrick Tatum <patricktatum@adr.org>; [REDACTED]
Subject: RE: [REDACTED]

***** External E-Mail – Use Caution *****

Ms. Santo,

While we reserve the right to pursue arbitration on behalf of additional claimants for whom Family Dollar has not paid the required filing fees, we join Family Dollar in asking AAA to reopen the arbitrations of the 1,166 claimants for which Family Dollar has committed to pay the required filing fees. I have attached an updated Exhibit B that shows only those 1,166 claimants.

Sincerely,

[REDACTED]

From: AAA Heather Santo <heathersanto@adr.org>
Sent: Friday, November 22, 2019 9:27 AM
To: Beth Berman <bberman@dollartree.com>; [REDACTED]
Cc: AAA Patrick Tatum <patricktatum@adr.org>; [REDACTED]
Subject: RE: [REDACTED] arbitrations

Dear Counsel,

This will acknowledge receipt of the below email from Respondent. We ask Claimants to provide their comments to Respondent's email by December 2, 2019.

Sincerely,

Heather Santo



Heather Santo

American Arbitration Association

1301 Atwood Ave, Suite 211N, Johnston, RI 02919
T: 401 431 4703 F: 401 435 6529 E: heathersanto@adr.org
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From: Beth Berman <bberman@dollartree.com>
Sent: Thursday, November 21, 2019 8:09 PM
To: AAA Heather Santo <heathersanto@adr.org>
Cc: AAA Patrick Tatum <patricktatum@adr.org>; [REDACTED]
Subject: [REDACTED] arbitrations

***** External E-Mail – Use Caution *****

Dear Ms. Santo,

While we continue to believe that none of the arbitration demands sent by [REDACTED] meets AAA's minimum filing requirements and further believe that the November 1, 2019 fee schedule should be applied to these demands, in order to move these arbitrations along Family Dollar will pay the \$2,200 per case filing

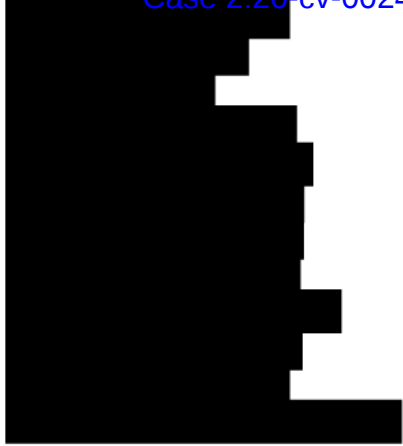
fee for each of the individuals identified on Exhibit B to [REDACTED]’s November 8, 2019, correspondence with the exception of the following individuals.

Individuals whose arbitration agreements provide for arbitration before JAMS, not AAA:

[REDACTED]

Individuals who are barred by their bankruptcy filings:

[REDACTED]



Individual who released the company from all employment related claims in 2018, after her employment with the company had ended:



That would leave 1166 claimants on the list. Please advise whether this is acceptable to AAA. If it is, Family Dollar will forward a check in the amount of \$2,565,200 to AAA. We also request, to the extent some of these cases never go forward, that AAA refund the filing fee for those cases in whole or in part.

Thank you.

Respectfully,
Beth Hirsch Berman
Deputy General Counsel, Litigation
Dollar Tree
500 Volvo Parkway
Chesapeake, VA 23320
Direct Dial: (757) 321-5966
Fax Number: (757) 321-5949
bberman@dollartree.com



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